

# U.S. Possessions Corporation Returns, 1983

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For 1983, U.S. "possessions corporations" claimed nearly \$2 billion of possessions tax credit [1]. This offset 100 percent of their U.S. income tax liability on income from business operations and qualified investments in U.S. possessions. As a result, the total U.S. income tax liability of corporations claiming the credit amounted to only \$36.8 million (compared to nearly \$4.5 billion in net income), nearly all of which was attributable to income derived from sources outside the U.S. possession.

The estimated "net" revenue cost as a result of the possessions tax credit was more than \$1.7 billion in lost U.S. tax revenues for 1983. This was slightly less than the credit itself, since possessions corporations could not claim certain other tax benefits on possessions source income which would otherwise have been available if the possessions tax credit provisions did not exist [2].

Puerto Rico has been the primary beneficiary of the possessions system of taxation (described later in this article) [3]. For 1983, more than 98 percent of all U.S. possessions corporations conducted business in Puerto Rico (defined as a U.S. "possession" under section 936 of the Internal Revenue Code) and accounted for virtually all (99.8 percent) of the possessions tax credit claimed. For this reason, the discussion of 1983 data in this article concerns itself with operations in Puerto Rico unless otherwise stated.

## BACKGROUND

The principal elements of beneficial tax treatment of income from U.S. possessions became part of U.S. tax law in 1921, primarily to aid U.S. corporations with subsidiaries in the Philippines (a possession of the United States from 1898 to 1946). Under provisions of the Revenue Act of 1921, U.S. corporations were exempt from U.S. taxation on all possession and other foreign source income if at least 80 percent of their gross income was derived from sources within a U.S. possession and at least 50 percent of their gross income was derived from the active conduct of a trade or business within a U.S. possession. These gross income tests had to be met in the year the exemption was taken and for the 2 immediately preceding years. A corporation that met these two gross income tests became known as a "possessions corporation." Such a corporation was

usually organized as a subsidiary of a U.S. parent company in order to ensure that the "80-50" percent income requirements were met.

Under certain conditions, it was possible to include these subsidiaries in the consolidated income tax returns of U.S. parent corporations and their affiliates, thus establishing a unique form of domestic tax treatment. In profitable years, the possessions subsidiaries and their income were excluded from the parent corporation's consolidated return; in loss years, parent corporations were allowed to offset their overall profits by including in their consolidated returns the possessions subsidiaries and their losses. These rules remained the basis for later provisions enacted by the Internal Revenue Code in 1954 which remained unchanged until 1976.

The Tax Reform Act of 1976 significantly modified the tax exemption for income derived by U.S. corporations from operations in a U.S. possession. While the 80 and 50 percent income tests remained intact, the Act provided for a credit against U.S. tax equal to that portion of the tax attributable to two kinds of income: (1) "possessions source business income," and (2) "qualified possessions source investment income." Each of these terms is explained in the Definitions section later in this article. Before 1976, a possessions corporation was exempt from U.S. tax on all income derived from sources outside the United States.

Under the 1976 Act, it was also necessary for a corporation to make an election to be treated as a possessions corporation. Once made, the election could not be revoked for 10 years without consent of the Department of the Treasury. During this 10-year period, possessions corporations could not be included with their parent corporations in filing consolidated returns, thus eliminating the benefits (described above) previously allowed parent corporations for years when the possessions corporation subsidiaries reported net losses. Figure A presents historical data on U.S. possessions corporations claiming a credit from 1976 (the initial year for which the credit was allowed) through 1983.

## RECENT LEGISLATIVE CHANGES

### Tax Equity and Fiscal Responsibility Act of 1982

Prior to 1982, there were no explicit guidelines regarding the allocation of income from intangible property (patents, trademarks, secret processes, and the like) between a

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**Figure A.—Corporations Claiming a Possessions Tax Credit, Income Years 1976–1983**

[Money amounts are in billions of dollars]

Income year	Number of returns	Net income	Income tax before credits	Possessions tax credit
	(1)	(2)	(3)	(4)
1976 <sup>1</sup> .....	384	\$1.5	n.a.	\$0.7
1977 .....	519	1.8	n.a.	0.8
1978 .....	598	2.5	n.a.	1.2
1979 .....	597	3.1	n.a.	1.4
1980 .....	589	3.5	1.6	1.6
1981 .....	565	4.3	1.9	1.9
1982 .....	544	4.6	2.1	2.1
1983 .....	553	4.5	2.0	2.0

<sup>1</sup> The possessions tax credit provisions were effective for taxable years beginning after December 31, 1975; therefore some corporations for Income Year 1976 were subject to the provisions in effect prior to 1976.

n.a. — Not available.

NOTE: There are small differences between income tax before credits in column (3) and the possessions tax credit in column (4) that are not apparent due to rounding. For example, for 1983, the amount of income tax before credits was \$2.008 billion while the possessions tax credit was \$1.966 billion.

possessions corporation and its affiliated U.S. parent corporation. Some U.S. corporations took the position that they could make tax free transfers of intangible assets to a possession corporation. The possessions corporation would produce the product utilizing the intangible asset, such as a patented formula to manufacture pharmaceuticals, and claim all the income derived from the product as possessions source income eligible for the possessions tax credit. The U.S. parent corporation would, in turn, claim on its tax return all the expenses incurred in developing the patented formula that was transferred to the possessions corporation without reporting the income associated with it.

In order to "lessen the abuse caused by possessions corporations claiming a full tax exemption for income generated by the types of intangible property referred to above, developed outside Puerto Rico," new rules regarding the allocation of intangible property income were provided in the Tax Equity and Fiscal Responsibility Act of 1982 (TEFRA) [4]. The general rule provided by TEFRA was that income generated by intangible assets received from a U.S. parent corporation was not income to the possessions corporation. Instead, it was to be treated as taxable income of the U.S. parent corporation. However, other provisions in TEFRA allowed possessions corporations and their U.S. affiliates to "elect out" of this general rule under either a "cost sharing" option or a "50–50 profit split" option.

Under the cost sharing method, a possessions corporation made a cost sharing payment to its parent corporation with respect to each product or service covered by the election according to a prescribed formula. There were provisions in the Internal Revenue Code specifying that the cost sharing payment would reduce the U.S. parent corporation's allowable deductions instead of increasing its gross income. Under the 50–50 profit split method, 50 percent of the combined taxable income of the possessions corporation and its U.S. affiliates was allocated to the possessions corporation. This income was derived from the specified

sales of the possessions product or type of service rendered to foreign affiliates or "unrelated persons" (i.e. individuals, corporations, partnerships, trusts, and others not affiliated with the possession corporation). The remaining 50 percent was generally allocated to the U.S. parent corporation. To qualify to use either the cost sharing method or profit split method, a possessions corporation had to meet one of several business presence tests [5].

Figure B shows the number of returns, possessions sales, the cost sharing payment, qualified possessions taxable income (defined in the Definitions section), and the possessions tax credit determined under the applicable election method as reported by U.S. possessions corporations for 1983. Because the TEFRA provisions regarding possessions corporations were not effective until taxable years beginning in 1983, only a portion of the possessions corporations filing tax returns for the 1983 study were affected by them [6].

**Figure B.—Returns of Possessions Corporations with One or More Election Methods Reported, Income Year 1983**

[Money amounts are in thousands of dollars]

Election method	Number of returns	Total possessions sales	Cost sharing payment	Qualified possessions taxable income	Possessions tax credit
	(1)	(2)	(3)	(4)	(5)
All returns .....	218	\$8,783,679	\$204,467	\$2,560,229	\$1,176,934
Cost sharing method only .....	162	5,810,646	192,183	1,716,077	788,951
50-50 profit split method only .....	41	1,685,850	—	367,199	168,585
Both methods .....	15	1,287,184	12,284 <sup>1</sup>	476,953	219,398

<sup>1</sup> Possessions corporations manufacturing more than one product could elect the cost sharing method for one product and the 50–50 profit split method for a second product. The same rules also applied to income arising from services rendered in different product areas. This amount represents the cost sharing payment calculated under the cost sharing method for companies using both methods. The possessions corporations' share of the combined taxable income of the possessions corporations and their U.S. affiliates under the profit split method were not tabulated separately for 1983.

NOTE: Detail may not add to total because of rounding.

Of the 218 possessions corporations reporting at least one of the two election methods, over 80 percent elected the cost sharing method for one or more of their possessions products or services [7]. The TEFRA provisions affect, for the most part, only possessions corporations in the manufacturing industries, because nonmanufacturing corporations generally paid taxes to Puerto Rico that were equivalent to their U.S. income tax liability. Of the 218 possessions corporation returns shown in Figure B, 215 were engaged in manufacturing.

The complexity of the TEFRA provisions relating to this allocation of income from intangible assets and the fact that only a portion of the tax returns for 1983 were covered by the provisions make it difficult to determine what impact these provisions have had on the activities of possessions corporations and their U.S. affiliates [8].

Another provision in TEFRA reduced the amount of investment income that a possessions corporation could

earn and still qualify for the possessions tax credit. The 50 percent active trade or business test for gross income was increased to 55, 60, and 65 percent for taxable years beginning in 1983, 1984, and 1985 (and thereafter), respectively. Judging by the data for 1983, the impact of this provision appears to have been quite small because qualified gross income from the active conduct of a trade or business in a U.S. possession for all possessions corporations accounted for nearly 92 percent of the possessions corporations' total income, well above the applicable percentages covered by the 1983 statistics (accounting periods ended July 1983 through June 1984).

### Tax Reform Act of 1986

The Tax Reform Act of 1986 made several changes in the possessions corporation provisions effective for taxable years beginning in 1987. First, the active trade or business test was further increased from 65 to 75 percent of gross income. Second, for possessions corporations that elected the cost sharing method, the cost sharing payment for research expenditures was increased by the larger of 10 percent or an amount equal to the royalty payment required if the sale of intangible assets was transferred or licensed to a related foreign corporation [9]. Third, for possessions corporations that elected the 50-50 profit split method, the deduction for research and development expenditures was increased by 20 percent. Fourth, the definition of qualified possessions source investment income was expanded to include income from funds invested in qualified Caribbean Basin countries (defined under section 212 of the Caribbean Basin Economic Recovery Act). Fifth, possessions corporations were allowed a credit for certain income received in the United States from "persons" unrelated to the possessions corporation. Finally, the definition of "possessions of the United States," for purposes of this credit, was expanded to include the U.S. Virgin Islands.

The first three changes were intended to further reduce the amount of qualified taxable income eligible for the possessions tax credit. The last three changes were to benefit possessions corporations and to encourage further investment and employment in Puerto Rico, the U.S. Virgin Islands, and other U.S. possessions.

### INDUSTRY HIGHLIGHTS

As already indicated, U.S. corporations with manufacturing subsidiaries received most of the tax benefits under the possessions system of taxation. Figure C shows that corporations manufacturing chemicals and allied products (pharmaceuticals, in particular) or electrical and electronic equipment claimed over 70 percent of the total possessions tax credit. These companies, however, represented less than 37 percent of all possessions corporations.

Figure C  
**Percentage of Total Possessions Tax Credit by Industry, Income Year 1983**

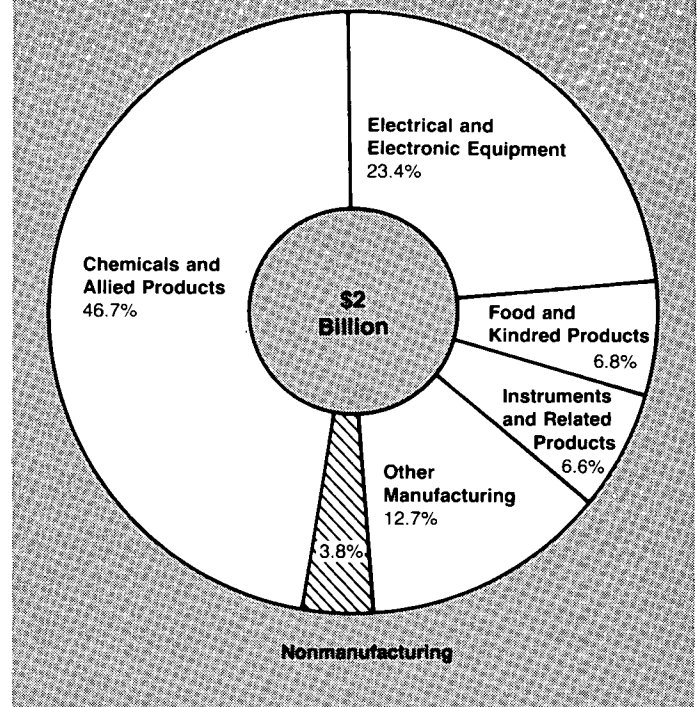


Table 1 shows complete balance sheets and income statements for the 625 possessions corporation returns processed for the 1983 study. Consistent with the credit, the industry with the largest amount of profits was chemicals and allied products, or more specifically, pharmaceuticals, with nearly \$2 billion in net income. This industry accounted for 46 percent of the total net income for all manufacturing possessions corporations. In contrast, nonmanufacturing possessions corporations accounted for only 4 percent of the total earnings (and credit claimed). A total of 53 possessions corporations reported losses for the year and thus, did not claim any credit [10]. Under prior law, these losses could have been utilized by the parent corporations to reduce their tax.

The predominance of manufacturing corporations in Puerto Rico reflects the incentives which the Government of Puerto Rico enacted to attract manufacturing firms. Under Puerto Rico's Industrial Incentive Act, most U.S. corporations establishing manufacturing subsidiaries on the island have been granted various exemptions, up to 100 percent, from Puerto Rican taxes. For 1983, these companies paid an average of 5 percent of their earnings in taxes to Puerto Rico [11].

## EMPLOYMENT DATA

One of the major objectives in enacting the possessions tax credit provisions in 1976 was to expand employment opportunities in Puerto Rico through investment by U.S. corporations. An indication as to whether this objective has been realized can be obtained from Federal unemployment insurance tax returns which were available for statistical processing for 376 possessions corporations in manufacturing industries for 1983. Table 2 presents, by industry, the total tax benefits derived from the credit, employment in Puerto Rico, and compensation of employees [12] [13]. A total of 75,642 workers were employed by the 376 corporations in 1983 compared to 138,853 employed by all manufacturing firms in Puerto Rico [14]. The average wages per employee paid by possessions corporations amounted to \$14,887 compared to \$11,510 for all manufacturing firms [15].

Table 2 also shows that these 376 possessions corporations received an average estimated tax benefit of \$19,781 per employee while paying out an average of \$14,887 in wages per employee. For corporations manufacturing pharmaceuticals, the average tax benefits per employee amounted to \$65,318 which was nearly three times the average compensation paid. In contrast, possessions corporations manufacturing textile mill products had an average tax benefit of \$1,228 which was approximately one-eighth of the average employee compensation.

The distribution of tax benefits in relation to the number of employees can be obtained by examining columns 4 and 6 of Table 2. The only manufacturing industry in which the share of tax savings greatly exceeded the share of employment was chemicals and allied products. Possessions corporations manufacturing these products received more than one-half of the total tax benefits but accounted for only one-sixth of the employees.

Figure D presents employment data by size of tax benefits for the 376 manufacturing possessions corporations [16]. The largest 17 corporations accounted for 31 percent of the total tax benefits but less than 5 percent of total employment. A total of 24 possessions corporations received no tax benefits due to "net operating losses" for the year. These loss corporations accounted for 7 percent of total employment.

## SUMMARY

Nearly \$2 billion in possessions tax credit was claimed for 1983. By claiming this credit, U.S. possessions corporations were able to offset all of their U.S. tax liability on qualified possession source business and investment income. Based on the employment data available for 1983, virtually all possessions corporations conducted business

**Figure D.—Tax Benefits and Employment of Selected U.S. Possessions Corporations, by Size of Tax Benefits Per Employee, Income Year 1983<sup>1</sup>**

(Money amounts are in thousands of dollars)

Size of tax benefits	Number of returns	Tax benefits <sup>2</sup>	Number of employees
	(1)	(2)	(3)
Total .....	376	\$1,496,296	75,642
No tax benefits .....	24	—	5,207
\$1 under \$500 .....	15	446	1,256
\$500 under \$1,000 .....	8	990	1,400
\$1,000 under \$5,000 .....	88	54,683	18,681
\$5,000 under \$10,000 .....	54	103,685	15,135
\$10,000 under \$50,000 .....	145	594,202	26,345
\$50,000 under \$100,000 .....	25	278,759	4,293
\$100,000 or more .....	17	463,531	3,325

<sup>1</sup> The data contained in this figure represent those U.S. possessions corporations for which Federal unemployment insurance tax return data were available for statistical processing for 1983.

<sup>2</sup> "Tax benefits" as used in this table are defined in footnote 16.

in Puerto Rico and may have benefited the Commonwealth by providing additional employment opportunities and higher than overall average wages. Possessions corporations in manufacturing industries, in particular those manufacturing pharmaceuticals, accounted for over 96 percent of the net income and credit claimed by all possessions corporations.

## DEFINITIONS

**Cost Sharing Payment.**—A payment calculated by a possessions corporation under the TEFRA provisions equal to a fraction of the total amount of "product area research" expenditures of the possessions corporation and its affiliates. For 1983, the fraction was equal to the ratio of sales (by the possessions corporation and its affiliates to "unrelated persons") of the "possessions product" or services rendered to the sales of all products or services rendered in the "product area."

**Qualified Possessions Source Business Income.**—Qualified possessions source business income was the sum of the gross income (receipts minus cost of sales and operations) of a possessions corporation from the active conduct of a trade or business within a U.S. possession and the net gain (or loss) from the sale or exchange of assets used by a possessions corporation in the conduct of business within a U.S. possession. For 1983, qualified possessions source business income for possessions corporations' reporting this information on Form 5735 (Computation of Possessions Tax Credit Allowed Under Section 936) amounted to nearly \$7.2 billion. This amount is slightly understated because some corporations did not attach Form 5735 with their return as originally filed.

**Qualified Possessions Source Investment Income.**—For 1983, qualified possessions source investment income was non-business income derived from the possession in which the corporation had its trade or business and which was attributable to the investment of funds derived from such trade

or business. For 1983, qualified possessions source investment income for possessions corporations reporting this information on Form 5735 amounted to \$580 million or 7.5 percent of the total qualified possessions source gross (business plus investment) income of \$7.8 billion. This amount is slightly understated because some corporations did not attach Form 5735 with their return as originally filed.

**Qualified Possessions Taxable Income.**—Qualified possessions taxable income represented the difference between the amount of the possessions corporation's qualified gross income and the applicable deductions reduced by any loss adjustments (such as current year losses from nonqualified sources and net capital losses). For 1983, qualified possessions taxable income for corporations claiming the possessions tax credit amounted to \$4.2 billion or 95.1 percent of the possessions corporation's total net income of \$4.5 billion.

**Total Possessions Sales.**—Under the TEFRA provisions, total possessions sales was an amount equal to the aggregate sales or other dispositions of the possession product (less returns and allowances) and services rendered by the possessions corporation and its U.S. affiliates to "persons" who were not members of the same affiliated group (see Figure B.)

## DATA SOURCES AND LIMITATIONS

The data in this article were tabulated from all returns filed through June 1985 by possessions corporations with accounting periods ending between July 1983 and June 1984. Whenever possible, a few outstanding returns were processed after the June 1985 cut-off date. Because 100 percent of the returns filed were prescribed for inclusion in the sample, the statistics are not subject to sampling error.

The estimates contained in this article are slightly understated because data are not included for 30 U.S. possessions corporations that filed tax returns for 1983 but were received too late for inclusion in the 1983 statistics [17]. However, the absence of these data should not be considered a major limitation of the statistics because the size of these corporations in terms of the totals for all possessions corporation returns was relatively small. General information regarding nonsampling error may be found in the Appendix of this report.

The statistics in this article may differ slightly from the data included in the U.S. Department of the Treasury report entitled *The Operation and Effect of the Possession Corporation System of Taxation, Sixth Report*. These differences are due to minor revisions made to the underlying data by the Office of Tax Analysis for the estimates contained in its report. Their report is part of the series of reports mandated by Congress by the Tax Reform Act of 1976 to evaluate the

effectiveness of the possessions corporation system of taxation.

## NOTES AND REFERENCES

- [1] The estimates contained in this article do not include data for 30 U.S. possessions corporations that filed tax returns for 1983. These returns were not available for statistical processing prior to the final cutoff date for the receipt of returns for the 1983 study. These 30 companies reported \$212.0 million of total assets, \$18.2 million of net income, and claimed a possessions tax credit of \$8.3 million. A total of 22 of these companies were manufacturing firms located in Puerto Rico. No attempt was made to impute the missing data or substitute returns for prior years.
- [2] The estimated net revenue cost was arrived at by calculating a foreign tax credit, investment credit, and a depreciation deduction computed under the Accelerated Cost Recovery System rules that possessions corporations might have claimed if the possessions tax credit provisions did not exist. The estimated revenue cost is shown in Table 1 as "Revenue cost due to possessions tax credit provisions." The estimates for this item may differ from those included in the *The Operation and Effect of the Possessions Corporation System of Taxation, Sixth Report*, U.S. Department of the Treasury, 1988, because of minor adjustments made in computing the revenue cost for this Treasury report. For possessions corporations in nonmanufacturing industries the estimated revenue cost is zero because these corporations generally did not qualify for tax exemption grants in Puerto Rico. Consequently, the U.S. tax liability of most of these companies would probably have been offset by the foreign tax credit claimed for taxes paid to Puerto Rico if the possessions tax credit provisions did not exist. (Puerto Rico and other U.S. possessions were considered to be "foreign countries" for foreign tax credit purposes.)
- [3] The possessions system of taxation in 1983 also applied to corporations operating in American Samoa, Guam, the Northern Mariana Islands, and Wake and Midway Islands. However, a total of only eight U.S. possessions corporations claimed a possessions tax credit for operations in these possessions in 1983. The credit claimed by these corporations totaled to \$2.2 million, or 0.1 percent of the total possessions tax credit claimed by all possessions corporations.
- [4] Quotation from Joint Committee on Taxation, *General Explanation of the Revenue Provisions of the Tax Equity and Fiscal Responsibility Act of 1982*, December 1982.

- [5] The two basic "business presence tests" provided for by the Tax Equity and Fiscal Responsibility Act of 1982 were the "25 percent valued-added test" and the "65 percent labor test." For a discussion of the requirements of these tests see U.S. Department of the Treasury, *The Operation and Effect of the Possessions Corporation System of Taxation, Fifth Report*, 1985.
- [6] Income Year 1983 covered possessions corporation tax returns with accounting periods ending July 1983 through June 1984. Thus, possessions corporations with full-year accounting periods ending prior to December 31, 1983, were not affected by the TEFRA provisions because their accounting periods began before January 1, 1983. There was a "grandfather clause" provided for in TEFRA which allowed manufacturing possessions corporations meeting certain requirements to be permanently excluded from coverage under TEFRA.
- [7] Under the provisions of TEFRA, it was possible for a possessions corporation manufacturing more than one product to elect the cost sharing method for one product and the 50-50 profit split method for a second product. The same rules also applied to income arising from services rendered in different product areas.
- [8] For a further analysis of the TEFRA provisions, see U.S. Department of the Treasury, *The Operation and Effect of the Possessions Corporation System of Taxation, Sixth Report*, 1988.
- [9] For more information regarding the calculation of this royalty payment, see Griggs, Robert S., "Recent Changes in the Taxation of Section 936 Corporations," *Tax Notes*, Tax Analysts, Arlington, Va., December 15, 1986.
- [10] There were also an additional 19 possessions corporations that also did not claim a credit for 1983, because they were either "breakeven" companies (i.e., total receipts minus total deductions were equal to zero) or because their net income for the year was completely offset by a "net operating loss deduction" for losses incurred in prior years.
- [11] U.S. Department of the Treasury, Fifth Report, *op. cit.*
- [12] The statistics contained in Table 2 are different from those included in the *Operation and Effect of the Possessions Corporations System of Taxation, Sixth Report*, U.S. Department of the Treasury, 1988. This is because the statistics in the Treasury report are weighted, by industry, using the ratio of cost of goods sold reported by all manufacturing possessions corporations to the cost of goods sold of manufacturing possessions corporations for which employment data were available. For a few possessions corporations without sufficient data for cost of goods sold, total assets was used as a substitute.
- [13] The possessions corporations "tax benefits" in Table 2 was arrived at by calculating the hypothetical U.S. tax liability for possessions corporations if the possessions tax credit had not been available. This calculation is the same as the "revenue cost due to possessions tax credit provisions" shown in Table 1. See footnote 2 for a more detailed explanation.
- [14] U.S. Department of Commerce, Bureau of the Census, *County Business Patterns*, Annual.
- [15] *Ibid.*
- [16] The estimates in Figure D will differ from those to be published in the U.S. Department of the Treasury's *The Operation and Effect of the Possessions Corporation System of Taxation, Sixth Report*. See footnote 12 for a more detailed explanation.
- [17] See footnote 1.

**Table 1.—All Returns of Active U.S. Possessions Corporations: Balance Sheets, Income Statements, Tax, and Distributions to Stockholders, by Selected Industry**

[Money amounts are in thousands of dollars]

Item	All industries	Construction	Manufacturing							Chemicals and allied products	
			Total	Food and kindred products	Textile mill products	Apparel and other textile products	Paper and allied products	Printing and publishing		Total	Drugs
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>Number of returns</b>	<b>625</b>	<b>8</b>	<b>524</b>	<b>26</b>	<b>6</b>	<b>83</b>	<b>9</b>	<b>6</b>	<b>97</b>	<b>62</b>	
<b>Total assets</b>	<b>22,204,674</b>	<b>36,573</b>	<b>17,230,878</b>	<b>1,522,861</b>	<b>68,815</b>	<b>579,809</b>	<b>36,226</b>	<b>43,976</b>	<b>7,875,163</b>	<b>7,402,851</b>	
Cash	3,343,079	934	3,126,866	630,733	4,993	123,534	2,603	6,064	980,499	834,280	
Notes and accounts receivable	4,025,798	9,469	3,128,938	336,558	10,938	201,114	6,555	2,959	1,153,543	1,048,829	
Less: Allowance for bad debts	32,317	—	22,759	12,539	17	135	106	35	2,696	2,023	
Inventories	1,686,131	130	1,605,561	168,538	3,406	73,479	3,054	1,996	415,782	370,037	
Investments in Government obligations	616,440	—	541,055	—	—	5,551	56	—	189,238	158,383	
Other current assets	1,254,684	2,538	1,216,979	13,905	694	8,874	717	11,137	711,085	688,977	
Loans to stockholders	133,924	424	127,035	33,386	—	7,083	—	—	10,499	10,484	
Mortgage and real estate loans	1,654,979	38	72,173	12,226	—	2,423	—	417	( <sup>(1)</sup> )	( <sup>(1)</sup> )	
Other investments	5,676,555	1,053	4,721,314	88,883	1,164	126,882	21,332	18,216	2,990,686	2,933,635	
Depreciable assets	4,117,926	5,925	2,893,462	289,622	3,963	57,858	3,334	5,734	1,213,203	1,129,070	
Less: Accumulated depreciation	1,388,479	2,446	1,014,854	98,293	2,824	30,743	1,564	2,604	359,154	330,148	
Depletable assets	18,893	—	1,799	—	—	—	—	—	1,457	1,457	
Less: Accumulated depletion	3,310	—	—	—	—	—	—	—	—	—	
Land	95,629	16,731	60,648	9,295	—	966	161	—	26,454	22,322	
Intangible assets	182,390	1	181,865	173	6	617	—	36	131,327	87,568	
Less: Accumulated amortization	111,738	1	111,377	128	4	435	—	5	78,402	37,850	
Other assets	934,089	1,776	702,174	50,502	46,495	2,741	83	62	491,640	487,830	
<b>Total liabilities and stockholders' equity</b>	<b>22,204,674</b>	<b>36,573</b>	<b>17,230,878</b>	<b>1,522,861</b>	<b>68,815</b>	<b>579,809</b>	<b>36,226</b>	<b>43,976</b>	<b>7,875,163</b>	<b>7,402,851</b>	
Accounts payable	1,680,184	4,380	927,138	245,453	381	49,721	821	1,353	227,291	187,298	
Mortgages, notes and bonds payable in less than 1 year	657,779	15,677	285,265	28,490	7	2,840	626	106	144,181	134,674	
Other current liabilities	2,403,976	4,104	362,221	40,698	306	19,470	1,609	1,465	156,150	149,279	
Loans from stockholders	202,601	—	197,003	121	15	121	—	—	40,766	39,615	
Mortgages, notes and bonds payable in 1 year or more	571,139	4,092	202,536	7,237	47	13,095	136	3,653	101,590	83,725	
Other liabilities	561,962	161	139,763	19,931	601	1,408	—	27	85,628	80,215	
Capital stock	307,772	881	290,407	29,638	371	16,020	305	92	121,078	69,548	
Paid-in or capital surplus	1,702,089	10	902,016	215,811	—	10,794	893	3,016	279,372	274,414	
Retained earnings, appropriated	238,429	—	191,878	13,149	—	—	1,689	—	2,857	2,266	
Retained earnings, unappropriated	13,895,650	7,865	13,740,446	924,976	67,085	467,409	30,148	34,264	6,716,264	6,381,818	
Less: Cost of treasury stock	16,909	597	7,794	2,644	—	1,071	—	—	13	—	
<b>Total receipts<sup>1</sup></b>	<b>13,715,750</b>	<b>23,119</b>	<b>12,286,763</b>	<b>1,068,810</b>	<b>36,538</b>	<b>590,679</b>	<b>31,283</b>	<b>26,405</b>	<b>3,713,924</b>	<b>3,444,965</b>	
Business receipts <sup>1</sup>	12,025,072	21,643	10,928,189	960,273	34,916	573,830	28,889	24,231	2,928,593	2,708,238	
Interest on State and local Government obligations <sup>1</sup>	18,284	—	16,244	—	98	203	—	—	9,988	8,566	
Other interest <sup>1</sup>	945,320	350	642,813	44,079	1,470	14,232	2,248	2,158	317,387	304,136	
Rents <sup>1</sup>	13,690	79	11,818	424	40	22	—	—	509	484	
Royalties <sup>1</sup>	4,157	—	4,131	—	—	57	—	—	2,309	2,309	
Net short-term capital gain reduced by net long-term capital loss <sup>1</sup>	9,919	—	9,919	—	—	—	—	—	9,091	9,091	
Net long-term capital gain reduced by net short-term capital loss <sup>1</sup>	13,506	—	13,344	3	—	26	—	—	7,799	7,799	
Net gain, noncapital assets <sup>1</sup>	8,152	904	1,029	37	—	52	—	3	17	17	
Dividends from domestic and foreign corporations <sup>1</sup>	74,203	—	72,182	8,244	—	25	—	—	30,394	29,957	
Other receipts (net) <sup>1</sup>	603,445	144	587,094	50,381	14	2,232	147	13	407,837	374,367	
<b>Total deductions<sup>1</sup></b>	<b>9,303,260</b>	<b>23,022</b>	<b>8,037,994</b>	<b>763,405</b>	<b>28,429</b>	<b>463,051</b>	<b>23,126</b>	<b>15,896</b>	<b>1,639,772</b>	<b>1,477,136</b>	
Cost of sales and operations <sup>1</sup>	6,853,254	14,090	6,355,902	642,001	23,765	412,311	20,105	12,702	948,241	841,877	
Compensation of officers <sup>1</sup>	23,931	174	13,147	1,715	—	2,808	—	144	2,682	2,560	
Repairs <sup>1</sup>	127,403	416	34,249	3,228	247	237	10	123	18,124	17,806	
Bad debts <sup>1</sup>	15,620	76	6,129	1,700	22	62	245	16	522	205	
Rents paid <sup>1</sup>	39,387	80	24,590	1,449	135	1,434	134	64	4,483	3,614	
Taxes paid <sup>1</sup>	205,233	669	176,912	12,230	536	11,559	451	392	16,297	14,712	
Interest paid <sup>1</sup>	247,627	461	25,377	3,721	17	308	64	23	12,713	11,924	
Contributions <sup>1</sup>	1,587	2	1,389	224	( <sup>(2)</sup> )	37	—	( <sup>(2)</sup> )	656	596	
Amortization <sup>1</sup>	56,814	—	56,499	—	—	29	—	—	1,419	1,383	
Depreciation <sup>1</sup>	223,988	1,157	139,251	11,473	413	3,201	324	398	46,369	44,071	
Depletion <sup>1</sup>	1,206	—	61	—	—	—	—	—	—	—	
Advertising <sup>1</sup>	57,380	58	51,613	17,946	8	101	9	107	24,434	19,651	
Pension, profit-sharing, stock bonus, and annuity plans <sup>1</sup>	20,813	131	14,901	2,478	11	1,195	19	47	4,816	4,689	
Employee benefit programs <sup>1</sup>	74,900	130	63,932	6,952	1,215	6,239	158	135	12,304	11,678	
Net loss, noncapital assets <sup>1</sup>	2,075	—	1,946	16	—	20	—	—	477	280	
Other deductions <sup>1</sup>	1,352,042	5,578	1,072,096	58,273	2,060	23,511	1,607	1,746	546,237	502,089	
<b>Total receipts less total deductions</b>	<b>4,412,490</b>	<b>97</b>	<b>4,248,769</b>	<b>305,405</b>	<b>8,109</b>	<b>127,628</b>	<b>8,157</b>	<b>10,510</b>	<b>2,074,152</b>	<b>1,967,830</b>	
<b>Net income (less deficit)</b>	<b>4,396,091</b>	<b>97</b>	<b>4,232,621</b>	<b>305,405</b>	<b>8,011</b>	<b>127,425</b>	<b>8,157</b>	<b>10,510</b>	<b>2,064,260</b>	<b>1,959,359</b>	
Net income	4,450,339	1,638	4,271,415	305,440	8,011	127,441	8,175	10,510	2,065,571	1,960,538	
Deficit	54,248	1,541	38,794	35	—	16	18	—	1,311	1,179	
<b>Income subject to tax</b>	<b>4,375,760</b>	<b>1,638</b>	<b>4,210,100</b>	<b>297,187</b>	<b>7,735</b>	<b>127,169</b>	<b>8,175</b>	<b>10,510</b>	<b>2,040,375</b>	<b>1,935,732</b>	
<b>Income tax before credits</b>	<b>2,008,414</b>	<b>688</b>	<b>1,932,890</b>	<b>136,645</b>	<b>3,497</b>	<b>58,069</b>	<b>3,679</b>	<b>4,794</b>	<b>937,002</b>	<b>889,075</b>	
U.S. possessions tax credit	1,966,168	668	1,892,215	133,511	2,913	56,293	3,679	4,668	919,736	871,902	
Foreign tax credit	3,619	—	2,500	—	—	17	—	—	2,421	2,379	
Investment credit	32	—	22	—	—	( <sup>(3)</sup> )	—	—	—	—	
Jobs credit	194	—	68	—	—	127	—	—	—	—	
Other credits	1,448	—	1,441	6	—	—	—	—	18	18	
<b>Income tax after credits</b>	<b>36,787</b>	<b>20</b>	<b>36,352</b>	<b>3,060</b>	<b>584</b>	<b>1,632</b>	<b>—</b>	<b>127</b>	<b>14,827</b>	<b>14,612</b>	
Revenue cost attributable to possessions tax credit provisions	1,745,195	—	1,745,195	125,398	2,853	54,931	3,271	4,584	857,298	813,341	
<b>Distributions to stockholders except in own stock</b>	<b>3,054,278</b>	<b>—</b>	<b>2,934,068</b>	<b>136,015</b>	<b>600</b>	<b>30,985</b>	<b>2,097</b>	<b>1,021</b>	<b>1,152,094</b>	<b>1,083,029</b>	

Footnotes at end of table.

**Table 1.—All Returns of Active U.S. Possessions Corporations: Balance Sheets, Income Statements, Tax, and Distributions to Stockholders, by Selected Industry—Continued**

[Money amounts are in thousands of dollars]

Item	Manufacturing									
	Petroleum (including integrated) and coal products	Rubber and miscellaneous plastics products	Leather and leather products	Stone, clay and glass products	Primary metals industries	Fabricated metal products	Machinery, except electrical	Electrical and electronic equipment	Transportation equipment	Instruments and related products
	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
<b>Number of returns</b>	<b>5</b>	<b>12</b>	<b>15</b>	<b>9</b>	<b>4</b>	<b>29</b>	<b>12</b>	<b>134</b>	<b>6</b>	<b>42</b>
<b>Total assets</b>	<b>907,426</b>	<b>109,863</b>	<b>164,414</b>	<b>55,235</b>	<b>26,603</b>	<b>310,337</b>	<b>169,425</b>	<b>3,668,946</b>	<b>63,651</b>	<b>1,047,066</b>
Cash	4,484	7,260	23,960	6,401	19,105	44,392	23,296	980,290	10,603	197,223
Notes and accounts receivable	154,948	24,528	64,000	30,106	2,980	62,951	53,437	628,298	39,797	151,978
Less: Allowance for bad debts	12	58	—	44	—	220	290	5,071	18	565
Inventories	151,351	11,534	30,703	2,637	1,791	35,948	26,203	477,633	5,273	84,012
Investments in Government obligations	—	—	2,955	—	—	7,414	3,030	91,975	—	223,521
Other current assets	52,227	1,405	419	175	62	4,003	824	338,807	56	44,476
Loans to stockholders	54,156	—	—	27	—	5,213	—	12,744	—	1,927
Mortgage and real estate loans	—	—	327	—	—	—	—	48,727	—	8,051
Other investments	294,128	31,282	26,885	11,247	—	60,698	37,289	742,375	4,093	179,922
Depreciable assets	347,275	44,535	19,023	8,559	4,265	95,461	19,749	495,298	6,030	178,963
Less: Accumulated depreciation	161,448	13,134	6,531	6,504	1,999	31,863	5,875	202,084	3,447	48,582
Depletable assets	341	—	—	—	—	—	—	—	—	—
Less: Accumulated depletion	—	—	—	—	—	—	—	—	—	—
Land	82	1,873	84	105	128	4,014	1,229	7,470	36	4,772
Intangible assets	24,754	—	—	—	—	—	—	2,992	1,252	18,708
Less: Accumulated amortization	14,920	—	—	—	—	—	—	1,320	113	16,008
Other assets	61	637	2,589	2,526	271	22,324	10,534	50,811	89	18,669
<b>Total liabilities and stockholders' equity</b>	<b>907,426</b>	<b>109,863</b>	<b>164,414</b>	<b>55,235</b>	<b>26,603</b>	<b>310,337</b>	<b>169,425</b>	<b>3,668,946</b>	<b>63,651</b>	<b>1,047,066</b>
Accounts payable	44,427	2,588	17,384	652	1,845	20,625	21,457	185,957	1,243	48,749
Mortgages, notes and bonds payable in less than 1 year	154	1,585	2,281	595	32	6,451	2,920	31,256	437	26,850
Other current liabilities	2,385	6,460	5,002	728	542	3,950	3,891	83,786	716	18,314
Loans from stockholders	28,240	478	—	1,001	—	—	1,109	124,869	—	257
Mortgages, notes and bonds payable in 1 year or more	—	2,219	3,243	2,500	897	8,020	172	51,250	116	5,107
Other liabilities	10	6	423	114	—	1,911	6	21,987	—	5,035
Capital stock	31,608	552	1,082	501	645	7,367	2,534	34,291	162	41,579
Paid-in or capital surplus	153,388	14,218	783	3,469	150	23,863	3,393	149,144	3,586	26,840
Retained earnings, appropriated	7,185	9,715	—	3,646	348	—	—	101,324	—	51,599
Retained earnings, unappropriated	640,029	72,095	134,255	45,529	22,145	238,579	133,943	2,885,131	57,392	822,736
Less: Cost of treasury stock	—	50	39	3,500	—	429	—	49	—	—
<b>Total receipts<sup>1</sup></b>	<b>1,964,583</b>	<b>81,141</b>	<b>199,055</b>	<b>24,516</b>	<b>15,986</b>	<b>203,529</b>	<b>161,086</b>	<b>2,849,726</b>	<b>46,407</b>	<b>655,928</b>
Business receipts <sup>1</sup>	1,912,262	66,889	196,168	21,447	14,675	190,738	154,841	2,618,531	43,536	581,919
Interest on State and local Government obligations <sup>1</sup>	—	—	411	—	—	355	—	1,743	192	2,867
Other interest <sup>1</sup>	29,905	2,263	1,736	949	1,311	7,506 <sup>2</sup>	3,808	160,889	2,670	38,331
Rents <sup>1</sup>	2,239	—	108	170	—	3,740	47	71	—	4,385
Royalties <sup>1</sup>	—	—	—	—	—	—	—	—	—	36
Net short-term capital gain reduced by net long-term capital loss <sup>1</sup>	—	—	—	—	—	—	—	84	—	—
Net long-term capital gain reduced by net short-term capital loss <sup>1</sup>	—	—	—	158	—	( <sup>2</sup> )	40	4,418	—	865
Net gain, noncapital assets <sup>1</sup>	11	817	5	2	( <sup>2</sup> )	2	( <sup>2</sup> )	32	( <sup>2</sup> )	15
Dividends from domestic and foreign corporations <sup>1</sup>	20,000	—	—	—	—	193	—	2,794	—	4,987
Other receipts (net) <sup>1</sup>	165	11,171	627	1,791	—	995	2,349	61,164	7	22,525
<b>Total deductions<sup>1</sup></b>	<b>1,844,298</b>	<b>52,604</b>	<b>165,734</b>	<b>22,983</b>	<b>10,956</b>	<b>150,523</b>	<b>120,232</b>	<b>1,831,457</b>	<b>32,914</b>	<b>370,849</b>
Cost of sales and operations <sup>1</sup>	1,804,040	39,498	152,321	15,659	9,393	130,666	98,265	1,436,890	29,663	272,466
Compensation of officers <sup>1</sup>	319	211	309	174	—	250	505	2,003	—	1,361
Repairs <sup>1</sup>	1,229	293	110	205	151	364	351	8,102	25	785
Bad debts <sup>1</sup>	—	35	54	73	—	162	323	2,695	15	38
Rents paid <sup>1</sup>	5,818	93	545	100	64	527	334	6,178	200	2,576
Taxes paid <sup>1</sup>	1,195	2,262	3,646	811	497	1,274	1,107	29,683	384	5,297
Interest paid <sup>1</sup>	11	392	334	462	9	1,349	206	3,027	37	703
Contributions <sup>1</sup>	—	5	25	( <sup>2</sup> )	( <sup>2</sup> )	23	( <sup>2</sup> )	309	27	44
Amortization <sup>1</sup>	575	2	( <sup>2</sup> )	25	—	( <sup>2</sup> )	—	54,055	—	193
Depreciation <sup>1</sup>	16,227	1,627	1,778	396	235	6,318	1,419	33,138	488	10,727
Depletion <sup>1</sup>	—	—	—	61	—	—	—	—	—	—
Advertising <sup>1</sup>	345	449	( <sup>2</sup> )	24	—	58 <sup>1</sup>	34	849	8	377
Pension, profit-sharing, stock bonus, and annuity plans <sup>1</sup>	—	98	49	45	2	44	1	4,150	57	1,386
Employee benefit programs <sup>1</sup>	1,510	735	998	299	221	374	568	15,505	172	12,782
Net loss, noncapital assets <sup>1</sup>	4	—	—	99	—	2	4	872	2	139
Other deductions <sup>1</sup>	13,026	6,904	5,564	4,549	384	9,113	17,112	234,002	1,836	61,974
<b>Total receipts less total deductions</b>	<b>120,284</b>	<b>28,537</b>	<b>33,321</b>	<b>1,534</b>	<b>5,030</b>	<b>53,006</b>	<b>40,854</b>	<b>1,018,269</b>	<b>13,493</b>	<b>285,079</b>
Net income (less deficit)	120,284	28,537	32,910	1,534	5,030	52,651	40,854	1,016,526	13,301	282,212
Net income	120,874	28,735	33,429	4,246	5,061	52,665	40,891	1,040,014	13,301	291,499
Deficit	590	198	519	2,712	31	14	37	23,488	—	9,287
<b>Income subject to tax</b>	<b>100,874</b>	<b>28,735</b>	<b>33,406</b>	<b>4,246</b>	<b>5,061</b>	<b>52,383</b>	<b>40,891</b>	<b>1,037,595</b>	<b>13,273</b>	<b>287,282</b>
<b>Income tax before credits</b>	<b>46,402</b>	<b>13,157</b>	<b>15,286</b>	<b>1,925</b>	<b>2,328</b>	<b>24,056</b>	<b>18,709</b>	<b>476,120</b>	<b>6,085</b>	<b>132,017</b>
U.S. possessions tax credit	46,163	13,157	15,274	1,881	2,328	23,621	18,670	461,467	5,683	131,018
Foreign tax credit	—	—	—	—	—	34	17	10	—	( <sup>2</sup> )
Investment credit	—	—	( <sup>2</sup> )	—	—	1	—	—	—	20
Jobs credit	—	—	—	—	—	—	—	—	—	—
Other credits	—	—	—	—	—	—	—	1,320	—	95
<b>Income tax after credits</b>	<b>240</b>	<b>—</b>	<b>12</b>	<b>44</b>	<b>—</b>	<b>400</b>	<b>21</b>	<b>13,321</b>	<b>402</b>	<b>884</b>
Revenue cost attributable to possessions tax credit provisions	39,338	12,410	14,997	1,841	2,279	21,644	18,391	409,148	5,455	122,038
<b>Distributions to stockholders except in own stock</b>	<b>86,075</b>	<b>12,760</b>	<b>1,798</b>	<b>1,587</b>	<b>166</b>	<b>21,962</b>	<b>2,120</b>	<b>1,266,310</b>	<b>3,808</b>	<b>161,812</b>

Footnotes at end of table.



**Table 1.—All Returns of Active U.S. Possessions Corporations: Balance Sheets, Income Statements, Tax, and Distributions to Stockholders, by Selected Industry—Continued**

(Money amounts are in thousands of dollars)

Item	Transportation and public utilities	Wholesale trade	Retail trade	Finance, insurance, and real estate			Services
				Total	Credit agencies other than banks	Other finance, insurance, and real estate	
	(21)	(22)	(23)	(24)	(25)	(26)	(27)
<b>Number of returns</b>	<b>5</b>	<b>26</b>	<b>7</b>	<b>23</b>	<b>13</b>	<b>10</b>	<b>30</b>
<b>Total assets</b>	<b>946,914</b>	<b>126,991</b>	<b>124,899</b>	<b>3,620,076</b>	<b>2,935,063</b>	<b>685,013</b>	<b>114,367</b>
Cash	30,751	64,588	10,174	104,647	94,503	10,144	5,101
Notes and accounts receivable	64,227	18,288	11,126	741,252	249,226	492,026	49,488
Less: Allowance for bad debts	2,113	413	5	5,623	5,018	605	1,283
Inventories	22,565	10,760	23,833	17,756	—	17,756	5,077
Investments in Government obligations	—	—	—	75,385	33,657	41,728	—
Other current assets	3,982	1,959	18,526	9,184	5,610	3,575	1,515
Loans to stockholders	—	4,765	—	984	984	—	716
Mortgage and real estate loans	—	—	—	1,582,687	1,582,687	—	81
Other investments	18,145	7,408	18,292	879,220	761,474	117,746	30,991
Depreciable assets	1,084,292	14,710	57,537	33,296	30,767	2,529	28,541
Less: Accumulated depreciation	327,945	3,798	24,581	1,804	847	956	13,042
Depletable assets	—	10,294	6,096	200	200	—	181
Less: Accumulated depletion	—	3,201	—	—	—	—	109
Land	11,517	454	—	140	—	140	6,140
Intangible assets	—	32	—	—	—	—	493
Less: Accumulated amortization	—	16	—	—	—	—	344
Other assets	41,492	1,160	3,901	182,752	181,820	932	822
<b>Total liabilities and stockholders' equity</b>	<b>946,914</b>	<b>126,991</b>	<b>124,899</b>	<b>3,620,076</b>	<b>2,935,063</b>	<b>685,013</b>	<b>114,367</b>
Accounts payable	38,084	7,638	41,055	654,249	4,609	649,640	7,219
Mortgages, notes and bonds payable in less than 1 year	15,183	39,617	3,290	294,158	293,298	860	1,436
Other current liabilities	39,244	4,841	1,121	1,989,935	1,986,355	3,580	2,227
Loans from stockholders	—	—	—	5,009	5,009	—	—
Mortgages, notes and bonds payable in 1 year or more	100,002	27,726	28,846	205,131	205,131	—	2,806
Other liabilities	4,771	39	1,214	413,932	408,746	5,186	2,082
Capital stock	1,304	7,360	4,936	1,607	1,085	522	1,167
Paid-in or capital surplus	728,825	14,076	10,130	27,230	9,789	17,441	19,494
Retained earnings, appropriated	14,020	43	—	32,488	32,488	—	—
Retained earnings, unappropriated	5,481	25,852	35,174	-3,664	-11,448	7,784	85,385
Less: Cost of treasury stock	—	202	866	—	—	—	7,450
<b>Total receipts<sup>1</sup></b>	<b>407,460</b>	<b>108,046</b>	<b>457,481</b>	<b>328,889</b>	<b>288,323</b>	<b>40,567</b>	<b>99,342</b>
Business receipts <sup>1</sup>	399,769	105,959	455,883	20,161	18,916	1,245	89,338
Interest on State and local Government obligations <sup>1</sup>	—	—	—	2,040	198	1,843	—
Other interest <sup>1</sup>	4,301	1,741	299	293,293	261,487	31,805	2,330
Rents <sup>1</sup>	651	218	57	862	862	—	6
Royalties <sup>1</sup>	—	26	—	—	—	—	—
Net short-term capital gain reduced by net long-term capital loss <sup>1</sup>	—	—	—	—	—	—	—
Net long-term capital gain reduced by net short-term capital loss <sup>1</sup>	162	—	—	6,202	842	—	—
Net gain, noncapital assets <sup>1</sup>	14	—	—	—	—	5,360	2
Dividend from domestic and foreign corporations <sup>1</sup>	11	—	620	1,389	1,389	—	—
Other receipts (net) <sup>1</sup>	2,550	102	622	4,942	4,629	313	7,665
<b>Total deductions<sup>1</sup></b>	<b>289,053</b>	<b>100,713</b>	<b>448,685</b>	<b>310,699</b>	<b>276,397</b>	<b>34,302</b>	<b>88,220</b>
Cost of sales and operations <sup>1</sup>	4,167	74,148	351,645	124	—	124	49,486
Compensation of officers <sup>1</sup>	415	350	911	8,471	8,198	276	463
Repairs <sup>1</sup>	86,429	261	4,124	808	754	54	1,116
Bad debts <sup>1</sup>	6,372	306	53	1,667	1,667	—	1,017
Rents paid <sup>1</sup>	1,607	830	6,648	3,061	2,764	297	2,547
Taxes paid <sup>1</sup>	10,351	1,759	7,467	4,498	4,312	186	3,527
Interest paid <sup>1</sup>	10,581	7,407	3,016	199,805	171,896	27,909	647
Contributions <sup>1</sup>	48	4	—	68	33	35	14
Amortization <sup>1</sup>	—	9	1	245	245	—	59
Depreciation <sup>1</sup>	73,629	1,280	4,069	2,283	2,182	101	2,298
Depletion <sup>1</sup>	—	1,134	—	10	—	10	—
Advertising <sup>1</sup>	1,438	235	227	2,364	2,289	76	1,446
Pension, profit-sharing, stock bonus, and annuity plans <sup>1</sup>	4,282	46	281	859	850	9	315
Employee benefit programs <sup>1</sup>	6,856	781	98	1,715	1,682	32	1,389
Net loss, noncapital assets <sup>1</sup>	—	76	2	51	51	—	—
Other deductions <sup>1</sup>	82,879	12,088	70,080	84,670	79,475	5,194	23,898
<b>Total receipts less total deductions</b>	<b>118,408</b>	<b>7,334</b>	<b>8,795</b>	<b>18,190</b>	<b>11,925</b>	<b>6,264</b>	<b>11,121</b>
<b>Net income (less deficit)</b>	<b>118,408</b>	<b>7,334</b>	<b>10,585</b>	<b>16,149</b>	<b>11,728</b>	<b>4,422</b>	<b>11,121</b>
Net income	118,475	13,876	10,585	21,383	16,962	4,422	12,819
Deficit	68	6,542	—	5,234	5,234	—	1,698
<b>Income subject to tax</b>	<b>118,475</b>	<b>13,764</b>	<b>10,058</b>	<b>9,044</b>	<b>4,622</b>	<b>4,422</b>	<b>12,681</b>
<b>Income tax before credits</b>	<b>54,409</b>	<b>6,160</b>	<b>4,566</b>	<b>4,019</b>	<b>2,045</b>	<b>1,973</b>	<b>5,683</b>
U.S. possessions tax credit	54,405	6,160	3,322	3,766	1,980	1,786	5,631
Foreign tax credit	—	—	1,119	—	—	—	—
Investment credit	—	—	10	—	—	—	—
Jobs credit	—	—	—	—	—	—	—
Other credits	—	—	—	—	—	—	8
<b>Income tax after credits</b>	<b>4</b>	<b>—</b>	<b>115</b>	<b>253</b>	<b>65</b>	<b>187</b>	<b>44</b>
Revenue cost attributable to possessions tax credit provisions	—	—	—	—	—	—	—
<b>Distributions to stockholders except in own stock</b>	<b>114,830</b>	<b>636</b>	<b>1,592</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>3,154</b>

<sup>1</sup> These amounts were not required to be shown separately for 56 possessions corporations using the profit split method to allocate intangible property income. For corporations not showing these separately, the net amounts have been included in the amounts shown for "other receipts."

<sup>2</sup> Absolute value less than \$500.

NOTE: Detail may not add to total because of rounding.

**Table 2.—Tax Benefits, Employment, and Compensation of Employees of Selected U.S. Possessions Corporations, By Selected Manufacturing Industry<sup>1</sup>**

[Money amounts are in thousands of dollars, except as indicated]

Selected manufacturing industry	Number of returns	Qualified possessions taxable income	Tax benefits		Employees		Total compensation of employees <sup>2</sup>		Tax benefits per employee (dollars)	Average compensation per employee (dollars)	Tax benefits as a percentage of average compensation per employee
			Amount	Percentage of total	Number	Percentage of total	Amount	Percentage of total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
<b>All manufacturing industries.....</b>	<b>376</b>	<b>3,515,565</b>	<b>1,496,296</b>	<b>100.0</b>	<b>75,642</b>	<b>100.0</b>	<b>1,126,047</b>	<b>100.0</b>	<b>19,781</b>	<b>14,887</b>	<b>132.9</b>
Food and kindred products.....	16	227,223	99,011	6.6	7,486	9.9	114,015	10.1	13,226	15,230	86.8
Textile mill products.....	4	1,114	467	( <sup>3</sup> )	380	0.5	3,652	0.3	1,228	9,611	12.8
Apparel and other textile products.....	64	112,909	50,100	3.3	13,571	17.9	141,356	12.6	3,692	10,416	35.4
Men's and boy's clothing.....	11	27,157	11,908	0.8	3,254	4.3	36,383	3.2	3,659	11,181	32.7
Women's and children's clothing.....	27	48,554	21,829	1.5	5,996	7.9	60,378	5.4	3,641	10,070	36.2
Hats, caps, and other accessories.....	11	17,071	7,665	0.5	1,544	2.0	15,579	1.4	4,964	10,090	49.2
All other textile products.....	15	20,127	8,698	0.6	2,777	3.7	29,016	2.6	3,132	10,449	30.0
Paper and allied products.....	4	5,742	2,601	0.2	87	0.1	1,442	0.1	29,897	16,575	180.4
Printing and publishing.....	5	8,435	3,768	0.3	273	0.4	4,582	0.4	13,802	16,784	82.2
Chemicals and allied products.....	69	1,786,585	764,712	51.1	12,621	16.7	271,938	24.1	60,590	21,546	281.2
Industrial chemicals, plastics materials, and synthetics.....	6	20,938	8,742	0.6	394	0.5	9,293	0.8	22,188	23,586	94.1
Drugs.....	44	1,704,491	730,587	48.8	11,185	14.8	245,364	21.8	65,318	21,937	297.8
Soap, cleaners, and toilet goods.....	8	35,217	14,603	1.0	446	0.6	7,719	0.7	32,742	17,307	189.2
All other chemical and allied products.....	11	25,939	10,779	0.7	596	0.8	9,562	0.8	18,086	16,044	112.7
Rubber and miscellaneous plastics products.....	9	14,378	6,365	0.4	926	1.2	12,200	1.1	6,874	13,175	52.2
Leather and leather products.....	11	29,318	13,186	0.9	3,353	4.4	36,476	3.2	3,933	10,879	36.2
Footwear, except rubber.....	7	26,714	12,029	0.8	3,106	4.1	33,918	3.0	3,872	10,920	35.5
All other leather products.....	4	2,604	1,157	0.1	247	0.3	2,557	0.2	4,684	10,352	45.2
Stone, clay, and glass products.....	6	—398	999	0.1	303	0.4	5,049	0.4	3,297	16,663	19.8
Fabricated metal products.....	19	38,971	16,243	1.1	1,254	1.7	19,747	1.8	12,952	15,747	82.3
Machinery, except electrical.....	7	37,113	16,744	1.1	830	1.1	13,468	1.2	20,173	16,227	124.3
Electrical and electronic equipment.....	104	865,688	357,380	23.9	22,003	29.1	346,733	30.8	16,242	15,758	103.1
Radio, television, and communication equipment.....	14	80,560	31,428	2.1	3,683	4.9	50,725	4.5	8,533	13,773	62.0
Electronic components.....	30	341,842	153,265	10.2	8,354	11.0	131,489	11.7	18,346	15,740	116.6
All other electrical and electronic equipment.....	60	443,286	172,686	11.5	9,966	13.2	164,519	14.6	17,328	16,508	105.0
Transportation equipment.....	5	11,622	5,085	0.3	630	0.8	7,994	0.7	8,071	12,689	63.6
Instruments and related products.....	32	212,950	90,631	6.1	8,577	11.3	86,819	7.7	10,567	10,122	104.4

<sup>1</sup> The data contained in this table represent those U.S. possessions corporations for which Federal unemployment insurance tax return data were available for statistical processing for 1983.<sup>2</sup> Compensation of employees was computed by multiplying 1.241 times total wages. The 24.1 percent reflects employer paid non-payroll costs, such as social security payments, in 1983.<sup>3</sup> Less than 0.05 percent.